



STATE OF NEW YORK
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL
LITIGATION BUREAU

Writer's Direct Dial: (212) 416-8029

By ECF

November 2, 2021

Hon. Ann M. Donnelly
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *John Does, et al. v. Hochul, et al.*, 21-cv-5067 (AMD-TAM)

Dear Judge Donnelly:

This Office represents Governor Kathy Hochul and Health Commissioner Howard Zucker (the "State Defendants") in the above-referenced matter. I write at this time in response to Plaintiffs' Motion to Proceed Using Pseudonyms and for Protective Order (ECF No. 41). As State Defendants are sued in their official capacities, with respect to any written agreement, as described in paragraph 6 of the proposed Protective Order (ECF No. 41-2), they request that their respective counsel be permitted to sign the applicable agreement in their stead. Subject to that one proviso, the State Defendants do not oppose the Plaintiffs' present motion or the proposed Protective Order submitted by Plaintiffs.

Thank you for Your Honor's consideration of this matter.

Respectfully submitted,

/s/ Seth J Farber
Seth J. Farber
Assistant Attorney General
Seth.Farber@ag.ny.gov

cc: All Counsel (via ECF)